

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION**

DC CAPITAL LAW FIRM, LLP,

Plaintiff/Counter-Defendant,

v.

THE HANOVER INSURANCE COMPANY,

Defendant/Counterclaimant.

**Case No.: 9:22-cv-80512-AHS
Judge Raag Singhal**

**DEFENDANT/COUNTERCLAIMANT THE HANOVER INSURANCE COMPANY'S
SECOND UNOPPOSED MOTION TO EXTEND THE TIME TO FILE REPLY IN
SUPPORT OF HANOVER'S MOTION FOR JUDGMENT ON THE PLEADINGS**

Defendant/Counterclaimant The Hanover Insurance Company ("Hanover"), through undersigned counsel and pursuant to Local Rule 7.1, respectfully submits this second unopposed motion to extend the deadline for Hanover to file its Reply in Support of Hanover's Motion for Judgment on the Pleadings from Friday, August 26, 2022 to Wednesday, August 31, 2022. Counsel for DC Capital Law Firm, LLP ("DC Capital") does not object to the requested extension.

1. Hanover filed its Motion for Judgment on the Pleadings on July 12, 2022. D.E. 25.
2. DC Capital filed its Opposition to Hanover's Motion for Judgment on the Pleadings on August 12, 2022. D.E. 30.
3. Pursuant to Local Rule 7.1.(c), Hanover's Reply originally was due on August 19, 2022.
4. Hanover filed its first unopposed motion to extend the time to file its Reply in Support of Hanover's Motion for Judgment on the Pleadings on August 15, 2022. D.E. 31.
5. Pursuant to the Court's Order Granting Hanover's first unopposed motion,

Hanover's Reply brief is currently due on Friday, August 26, 2022. D.E. 32.

6. Counsel is working diligently to finish Hanover's Reply brief ahead of the current August 26, 2022 deadline. However, counsel requests a short extension of time to ensure adequate time to finalize the brief and to confer with their client.

7. This motion is made in good faith with no intent to unduly delay these proceedings.

8. This is Hanover's second request for an extension of time to file its Reply brief for a combined total of twelve days.

9. No further extensions will be requested absent unforeseen circumstances.

10. Undersigned counsel certify that they have consulted with counsel for DC Capital and are authorized to represent that DC Capital does not object to the requested extension.

WHEREFORE, Defendant/Counterclaimant The Hanover Insurance Company respectfully requests this Court to extend the deadline for Hanover to file its Reply in Support of Hanover's Motion for Judgment on the Pleadings from Friday, August 26, 2022 to Wednesday, August 31, 2022.

Dated: August 24, 2022

Respectfully submitted,

/s/ Charles C. Lemley

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